

authority during the existence of the Philippine Commonwealth. Jurisdiction by certiorari over final judgments and decrees of the Supreme Court of the Philippine Islands has been granted the Supreme Court of the United States in the following cases: (i) In which the Constitution or any statute or treaty of the United States is involved⁵ (2) in which the value in controversy exceeds 50,000 pesos (\$25,000); and (3) in which the title or possession of real estate exceeding in value the sum of 50,000 pesos (\$25,000) is brought in question. This jurisdiction now will extend to a fourth class of cases, namely, those involving the Constitution of the Commonwealth of the Philippines.

As a review is not a matter of right but of sound judicial discretion, in practice very few cases gained the attention of the United States Supreme Court. Yet these few cases have resulted in the announcement of legal principles of paramount importance. Especially was this true in the early days when the status of the Philippine Islands was to be determined. In the future it will be interesting to note the trend of interpretative decisions of the Constitution of the Commonwealth of the Philippines.

PHILIPPINE LAW ⁷

The Philippines is unique in that Philippine law is an amalgamation of practically all types of juridical thought. No less than four of the legal systems of the world, the civil law, the common law, the Mohammedan law, and the Malay customary law, have met in the Philippines and there blended.

Roman law as precisely developed by Justinian spread to Spain and by Spain was transplanted to the Philippines in codified form. The common law of the Englishmen went with them to the United States, was in that country expanded,

⁷ For a judicial exposition of the status of Philippine law, see the exhaustive decision in the case of *In re Shoo\$* (1920), 41 Phil. 213.